

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jason Hill,	
Plaintiff,	
v.	Case No: 1:22-cv-06990
DePaul University,	Judge John F. Kness
Defendant.	Jury Trial Demanded

MOTION TO SEAL EXHIBITS

Pursuant to the Protective Order entered by this Court, Plaintiff/, Jason Hill , respectfully moves this Court for an Order to seal the following exhibits:

1. Exhibit 5(b), 7, 9, 12-16, 18-30 which consist of protected emails between various administrators at DePaul University.

In support of this Motion, Dr. Hill states as follows:

1. This Court entered a Protective Order in this case, recognizing the need to protect sensitive, confidential, and proprietary information from public disclosure.
2. The aforementioned exhibits contain confidential information that falls within the scope of the Protective Order, including [describe the type of confidential information, such as trade secrets, personal data, proprietary business information, etc.].
3. Disclosure of this information to the public would violate the spirit of the protective order.

4. The Protective Order allows for documents containing such confidential information to be filed under seal to prevent unnecessary public disclosure.
5. There is no less restrictive means available to protect the confidentiality of the information contained in these exhibits other than sealing the documents.
6. Jason Hill respectfully requests that the Court permit these exhibits to be filed under seal in accordance with the Protective Order and maintain their confidentiality throughout the duration of this litigation.

WHEREFORE, Dr. Hill respectfully requests that this Court grant this Motion and enter an Order directing that the specified exhibits be filed under seal in accordance with the Protective Order entered in this case, and grant such further relief as the Court deems just and proper.

Respectfully submitted,
s/ Gianna Scatchell Basile
s/ Christopher C. Cooper

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the foregoing Plaintiff's Motion for Leave to File Brief in Excess of 15 Pages was served on all counsel of record via this Court's CM/ECF filing system on August 9, 2024.

s/ Gianna Scatchell Basile